

GOLUB PRIVACY POLICY

Golub Realty Services LLC (“Company” or “we”) respects your privacy. This privacy policy (the “Policy”) explains how we collect, use, maintain and disclose certain Personal Information (“PI”). PI may be provided to us by you when you visit websites owned by the Company, download or use our mobile applications (collectively, the “Site”), contact us by phone or email, visit one of our properties or through other means, such as through third-party service providers working with us. By using the Site or visiting one of our properties, you agree to our collection, use, and sharing of your PI as described in this Policy.

This Site is controlled, operated, and administered by the Company from its offices within the United States and is intended to serve individuals interested in properties or employment with the Company in the United States. If you are accessing this Site from a location outside the United States, you acknowledge and consent to the collection, usage, maintenance and disclosing of your PI to our properties in the United States and to other parties with whom we may share it as outlined in this Policy. Please note that privacy laws in the United States may not offer the same protections as the laws of other countries.

If you are a resident of California, please see the section entitled [CCPA Privacy Notice for California Consumers](#).

PI Defined. As used herein, “PI” means information by which you can be personally identified and includes a person’s first name or first initial and last name in combination with any one or more items of identifying categories of data, including:

- Personal or government identifiers: social security number, driver’s license number or government-issued identification number, physical or email address, telephone number;
- Online identifiers and internet, application or network activity data: IP address, browsing history, social media profiles, device information and other information we may collect automatically when you interact with us online;
- Financial information: bank account number or credit or debit card number in combination with or without any required security code, access code, or password that would permit access to an individual’s financial account debit card or credit card balance, payment history or information pertaining to your credit, assets, income or liabilities;
- Demographic information: age or date of birth, gender, number of children, household income details;
- Protected characteristics: age, gender, race or any other protected classifications under law;
- Commercial information: real property purchased, leased, or rented by you, vehicle information, products or services purchased, obtained, or considered, or other purchasing or consuming histories or practices;
- Professional or employment-related information: education, occupation or other employment information;
- Geolocation data;

- Information we may collect automatically when you visit our properties, such as images captured by video surveillance cameras;
- Other information provided to us in connection with the provision of our services;
- Inferences drawn from any of the information listed above.

PI does not include publicly available information or any information that is lawfully made available to the general public from the federal, state or local government.

Collection of PI.

Information You Provide To Us When you complete an application on our website and during the tenure of your stay with us, we will ask you to disclose certain PI.

If you contact us to learn more about our properties, we may collect information such as your full name, telephone number, and email address. We will also collect other information that you provide to us, such as your questions, comments, or feedback as well as any responses you provide in surveys that we may send on occasion.

If you are a current or prospective tenant, we may ask you to disclose certain PI as part of your application and during the tenure of your stay with us, such as your current or prior address(es); contact information, such as your telephone number or email address; date of birth; education, occupation, or employment information; Social Security number or other national identification number; income and other financial information; familial status and information about your dependents; vehicle information; credit information; criminal history; and emergency contact information. We may also collect information about other occupants or prospective occupants of the property you are applying for, such as roommates, spouses, or minor children, or information about any guarantor(s).

Additionally, if you are a tenant and choose to use the online portal, we collect information when you pay your rent online, such as bank account information and transaction history, and about any other communications with us, such as work orders or messages that you send to management.

If you apply for employment with us through the Site, we collect information associated with your application, such as your contact information and resume.

Information Automatically Collected When you visit our Site or property, we may collect some information automatically, including:

Cookies, Web Beacons, and Other Internet Technologies. We employ various technologies on the Site to make your experience more enjoyable. We may directly or through our vendors collect information through "cookies." Cookies are small strings of text sent by the Site to your browser and then stored by your browser on your

computer's hard drive. Cookies help us understand how you use our Site and other linked sites so that we can personalize and improve your experience on the Site. We use cookies to, among other things, identify your computer during a particular visit to the Site and analyze visitor behavior. Most web browsers provide you with the ability to accept or decline cookies, as well as to be warned each time a cookie is being sent. In order to create a profile on the Site, you must have your cookies turned on.

Web beacons are electronic files that are placed on a web site and allow the website to count users who have visited that page or to access certain cookies. There are also other methods used to collect information about visitors to any website. At this time, we only use cookies and web beacons for the purpose of collecting information about the visitors to the Site in an aggregated form. For instance, we may gather certain information such as the number of unique visitors, the frequency with which they visit and pages viewed. We look at the data in summary form, rather than on an individual basis. We gather this information so it can, for example, learn how many people visit the Site, see which pages are the most viewed and identify which web sites are referring visitors to the Site. However, we do not use cookies, web beacons, or any other internet technology to collect PI about you.

At this time, the Site does not recognize automated browser signals regarding tracking mechanisms, such as "do not track" instructions. You can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. Look under the heading "Tools" (or similar heading) in your particular browser for information about controlling cookies. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also generally set your browser to turn off cookies. Since cookies allow you to take advantage of some of the Site's features, we recommend that you leave them turned on. If you block, turn off or otherwise reject cookies, you may not be able to use some of the features on our Site.

Video Surveillance. In order to ensure the safety of our tenants and visitors and to protect our property, we may use video surveillance (Closed Circuit Television or CCTV) at our properties. This collection is subject to applicable privacy laws and may be shared in limited circumstances, as detailed in section Use and Sharing of PI of this Privacy Policy.

Information from Other Parties

We also collect information from other parties, such as identity verification services or credit reporting agencies.

Use and Sharing of PI. PI may be collected, retained, shared, disclosed and used by us, our affiliates or our third-party service providers for our business purposes, including:

- Confirming your identity;

- Determining your eligibility for tenancy when you apply and determining that you continue to meet eligibility/suitability requirements during your lease term with us;
- Completing the leasing process;
- Requesting credit and background check reports in connection with leasing applications;
- Contacting you in response to your inquiries, comments and suggestions or when otherwise necessary;
- Tracking the activity of users and their use of the Site for business purposes and research, user and market analytics or Site improvement;
- For special promotions, contests or surveys regarding products and services provided by us, our affiliates or partners;
- Completing rental payments or other transactions on the Site;
- Providing rental services and building and/or leasing services;
- Notifying Site visitors about updates to the Site;
- For collection of amounts you may owe.

In the course of providing our services, carrying out our business and operations and seeking to improve the utility of the Site, we may transfer or share your PI to or with our offices, affiliates, and third-party service providers in the United States. Our affiliates and third-party service providers will be or are limited in how they may use any PI they are provided; specifically they may only use this PI in accordance with this Policy regardless of where it is transferred. We may share your PI as follows:

- Within our company and among all affiliates;
- To our third-party service providers or others such as independent contractors, credit reporting agencies, background check reporting agencies, collection agencies or prospective purchasers of the property or their agents and employees with PI as we believe necessary for our business purposes;
- For investigating, preventing, or taking action regarding illegal activities, suspected criminal conduct, situations involving potential threats to the safety of any person, or violations of this Policy;
- As required by law or regulation or as may be requested by government authorities;
- In connection with any acquisition, merger, sale or other transfer of any portion of our business or property;
- For commercial purposes (which may be considered “sales” in certain jurisdictions);
- With your consent: We may request your permission to share your PI for a specific purpose. We will notify you and request consent before you provide the PI or before the PI you have already provided is shared for such purpose.
- Without identifying you: We may share information in a manner that does not identify you. For example, we may share anonymous, aggregate information about your use of our Site and products with our service providers.

Site Security. We have reasonable and appropriate security measures in place to attempt to protect against the loss, misuses, and alteration of your PI under our control. In all cases, we have taken reasonable steps to confirm that reasonable measures have been implemented for

protection from unauthorized access. However, no location or security system is impenetrable, and we cannot guarantee the security of our premises, Site or databases or our electronic communications. In addition, transmissions to and from the Site are not encrypted. Accordingly, you should carefully consider whether to submit any sensitive PI that you would not want made public. You acknowledge and agree that your use of the Site is solely at your own risk.

The Site may offer links to other sites for your convenience. Such sites may have information, policies and practices different from the Site. We do not control and are not responsible for the privacy policies, practices and/or content of such third-party sites. We encourage our users to be aware when they leave the Site and to read the privacy policies and/or terms of use of each and every third-party site that collects PI.

Nothing contained in this Policy shall constitute a representation or warranty that PI will not be misplaced, duplicated or stolen and no liability is assumed with respect to any such occurrence.

Third Party Information Collection. Some content or applications on the Site may be provided by third parties, including advertisers, ad networks and servers, analytics companies, and application providers. These third parties may use cookies or other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your PI or they may collect information, including PI, about your online activities over time and across different sites and other online services. We do not control these third parties' tracking technologies or how they may be used. If you have any questions, you should contact the responsible provider directly.

One of the third-party services the Site uses is Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to analyze how individuals use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on Site activity, and providing other services relating to Site activity. We may also enable additional Google Analytics Advertising Features, including Remarketing. Remarketing uses the Google Analytics and/or a third party cookie to serve advertisements to you across the Internet based on your visit to our Site. For more information about how Google collects and uses information, visit www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time. To opt out of being tracked by Google Analytics across all sites visit: <http://tools.google.com/dlpage/gaoptout>.

We may also use Facebook remarketing, a service offered by Facebook Inc. ("Facebook") to service advertisements on third-party websites after you visit our Site. For more information about interest-based advertising from Facebook, visit <https://www.facebook.com/help/164968693837950>. To opt out from Facebook's interest-based ads, visit: <https://www.facebook.com/help/568137493302217>.

Physical Storage and Access to PI. We will keep PI you provide to us in our files. If you become a tenant in our property, we will keep PI in a tenant file. If you do not become a tenant, we will keep PI in a general file. The property owner, property manager and, if applicable, agents and employees of the foregoing, will have access to the files in accordance with this Policy and pursuant to security measures designed to safeguard any PI.

Disposal of Records Containing PI. It is our policy to dispose of business or customer records that contain PI by shredding, erasing or otherwise destroying physical or electronic media in a manner consistent with this Policy so that it cannot practicably be read or reconstructed. We may do so by contracting with a third-party engaged in the business of record destruction.

Children Under 16. We do not collect or maintain information from persons we know are under the age of 16, and we do not permit persons under the age of 16 to become registered users of our Site. No part of our Site is structured to attract anyone under the age of 16. By using our Site you represent that you are not under the age of 16.

Consent and Opting-Out. By using the Site and providing us with PI, you have consented to our contacting you by email to provide you with information relating to the property you inquired about and other services we or our third parties offer. You may opt out of any future commercial email messages from us by choosing the link with instructions on how to remove yourself from our email list. Please note that if you are a tenant in one of our communities and you opt out of receiving commercial email from us, you will continue to receive email from us regarding operational issues surrounding your lease and/or your community.

Changes to the Policy. We reserve the right, at any time, to add to, modify or remove portions of this Policy. Please check back to this page periodically to determine if the Policy has been changed. If this Policy is changed, the date listed below will be changed and we will post a notice to that effect on the Site's home page for at least 30 days after the change. If you have provided us with your email address, we may (but are not required to) send you an email notifying you of the changes. Your continued use of the Site after any changes have been made will constitute acceptance of the revised Policy and consent to any terms contained in the revised Policy.

Operation in the U.S.; Use of English. The Site is operated, in whole or in part, from the United States. By using the Site, regardless of where you live in the world, you consent to have any PI you provide through the Site transferred to and processed in the United States, and allow us to use and collect your PI in accordance with this Policy. Text on the Site may be published in languages other than English. In all instances, the English language version of any text, including this Policy, controls the legal impact and interpretation of the Site and its use.

Contact Us. If you believe that we have acted inconsistently with this Policy or you would like any of your information modified or deleted from our database or you would like to opt out of any future communications, please notify us at the address below. We may take a reasonable

period of time to respond. If you request the deletion or change of information on our system, such information may be retained for a period in our backup systems as a precaution against systems failures. Some information may be retained for longer periods as required by law, contract or auditing requirements.

If you have questions or comments about this Policy or the Site, you may send us an email at dataprivacy@goco.com or (312) 440-8753. Please note: Only inquiries regarding this Policy can be answered at this address and number.

CCPA Privacy Notice for California Consumers

If you are a California resident, you may have the following rights with respect to your Personal Information, subject to applicable exceptions:

Right to access Personal Information. You may be entitled to request that we disclose to you the specific pieces of your Personal Information that we have collected in the 12 months preceding your request.

Right to data portability. You may be entitled to request a copy of your electronic Personal Information in a readily-usable format.

Right to disclosure. You may be entitled to receive the following information with respect to the 12 months preceding your request: the categories of Personal Information we have collected, the sources from which we collected that Personal Information, the purposes for which we collected and shared that Personal Information, the categories of Personal Information that we sold and the categories of third parties to whom we sold Personal Information, and the categories of Personal Information that we disclosed for a business purpose.

Right to deletion. You may be entitled to request that we delete the Personal Information that we have collected from you. We will use commercially reasonable efforts to honor your request, in compliance with applicable laws. Please note, however, that we may need or be required to keep such information, such as for our legitimate business purposes or to comply with applicable law.

Right to ask us to refrain from selling your Personal Information: We do not sell your Personal Information.

Please note that these rights may be limited under applicable laws. For example, we may need to retain certain Personal Information for business purposes, to complete transactions you have requested, to comply with our legal obligations, or for other purposes as required or permitted by applicable law.

If you wish to exercise your rights under applicable law, please contact us at dataprivacy@goco.com or (312) 440-8753. If you would prefer, you may designate an authorized agent to make a request on your behalf. Please note that we may require additional information in order to verify your identity and process your request. We will not discriminate against you because you exercise any of the consumer rights described in this section.

In addition to the rights described above, California residents who provide Personal Information to us in obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information that we disclosed, if any, to other businesses for their own marketing purposes in the immediately prior calendar year. This request may be sent electronically by email to dataprivacy@goco.com or by phone at (312) 440-8753. We will respond to these requests within 30 days. Requests for this information that come to us through other channels may result in a delayed response. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response.

Policy last updated: June 8, 2020